

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

In re: Theresia A. Connell

Case No. 11-62065

Chapter 7

Debtor(s)

**MOTION FOR TURNOVER ORDER**

Comes now William F. Schneider, Trustee in the above-styled case, and moves the Court for the entry of an order requiring the Debtor to turn over to the Trustee within ten (10) days of the date of the entry of this Court's Order the following,

1. The \$65.00 in Navy Federal Credit Union account (xxx702) on August 16, 2011.
2. The 1999 Dodge Ram, 1983 Haynes Horse Trailer, 1988 Flat bed Trailer, 1988 Holiday House Mobile Home, and 2002 Snowbear Trailer listed on the debtor's Schedule B.
3. The 4 kayaks and 2 cameras listed on the debtor's Schedule B.
4. Documentation showing the ownership interest in The Presidential Resort at Chancellorsville, Spotsylvania County, Virginia and documentation evidencing any liens secured thereby and the balance owing, if any, and
5. The debtor's 2011 federal and Virginia income tax returns when filed and 62.19% of her half of any refunds owing to her or 62.19% of her half of any refunds on jointly filed tax returns.

WHEREFORE, the trustee prays that the Court, after notice and an opportunity for hearing, sustain the objection or makes other determination as is appropriate.

Date: October 14, 2011

William F. Schneider, Trustee

By: /s/ William F. Schneider  
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